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Class counsel for Plaintiffs

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

VINH NGUYEN, INDIVIDUALLY
AND ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED.

Plaintiff,

V.

RADIENT PHARMACEUTICALS
CORPORATION AND DOUGLAS C.
MACLELLAN.

Defendants.

CASE No.:CV-11-0406-DOC
(MLGx)

CLASS ACTION

**LEAD PLAINTIFFS' NOTICE OF
MOTION AND MOTION IN
SUPPORT OF FINAL APPROVAL
OF CLASS ACTION
SETTLEMENT AND PLAN OF
ALLOCATION**

Judge: Hon. David O. Carter
Courtroom: 9D
Hearing Date: April 22, 2014
Hearing Time: 8:30 a.m.

1 TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

2 PLEASE TAKE NOTICE that, pursuant to Court's Preliminary Approval and
3 Notice Order of January 31, 2014, on April 22, 2014 at 8:30 a.m., or as soon
4 thereafter as counsel may be heard, at the Ronald Reagan Federal Building and
5 U.S. Courthouse, 411 West Fourth Street, Santa Anna, CA 92701, before the
6 Honorable David O. Carter, United States District Judge, Lead Plaintiffs,
7 through their Counsel, will move for final approval of the class action Settlement
8 and the Plan of Allocation of settlement proceeds. Lead Plaintiffs' motion is
9 based on the Memorandum of Law in Support; the Declaration of Laurence M.
10 Rosen in Support of Lead Plaintiffs' Motion for Final Approval of Class Action
11 Settlement and Plan of Allocation, and Award of Attorneys' Fees and
12 Reimbursement of Expenses; the Stipulation and Agreement of Settlement dated
13 December 16, 2013; and all other pleadings and matters of record and such
14 additional evidence or argument as may be presented at the hearing. An
15 additional copy of the parties' [Proposed] Final Judgment and Order of
16 Dismissal is filed herewith.

17 DATED: March 24, 2014

18 Respectfully submitted,

19 **THE ROSEN LAW FIRM P.A.**

20 /s/ Laurence M. Rosen
21 Laurence M. Rosen (SBN 219683)
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27 Lead Counsel for Lead Plaintiffs and the
28 Class

CERTIFICATE OF SERVICE

I, Laurence M. Rosen, hereby declare under penalty of perjury as follows:

I am the managing attorney of the Rosen Law Firm, P.A. I am over the age of eighteen.

On March 24, 2014, I electronically filed the attached **LEAD PLAINTIFFS' NOTICE OF MOTION AND MOTION IN SUPPORT OF FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION** with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel of record.

Executed on March 24, 2014

/s/ Laurence Rosen

Laurence M. Rosen